
From: Casper, Joseph S. <jcasper@nssga.org>
Sent: Wednesday, November 30, 2016 4:51 PM
To: zzMSHA-Standards - Comments to Fed Reg Group
Subject: NSSGA comment on RFI
Attachments: DOC113016.pdf

NOV 30 2016

Response from NSSGA on RFI on diesel exhaust for underground miners. Pleased to engage in the MSHA-NIOSH partnership on this. Joe Casper

November 30, 2016

U.S. Mine Safety and Health Administration
Office of Standards, Regulations and Variances
201 12th Street South
Arlington, VA
Re: Exposure of RIN: 1219-AB86

Dear Madame/Sir:

NSSGA submits these comments in regard to MSHA's request for information on the issue of underground miners' exposure to diesel exhaust.

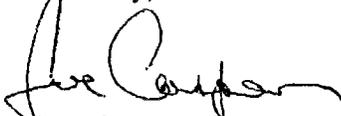
By way of background, the National Stone, Sand and Gravel Association (NSSGA) is the leading voice and advocate for the aggregates industry. NSSGA's members – stone, sand and gravel producers and the equipment manufacturers and service providers who support them – are responsible for the essential raw materials found in every home, building, road, bridge and public works project and represent more than 90 percent of the crushed stone and 70 percent of the sand and gravel produced annually in the United States. Production of aggregates in the U.S. in 2015 was more than 2.25 billion metric tons valued at \$21 billion. The aggregates industry employs approximately 100,000 highly-skilled men and women.

NSSGA is pleased that MSHA has agreed to work with the National Institute of Occupational Safety and Health (NIOSH) in a diesel exhaust health effects partnership. Just as NSSGA works with MSHA via the Alliance for education and training, so too does NSSGA work with NIOSH on behalf of worker safety and health. NSSGA would be pleased to engage in this process.

Obviously, this is a very complicated area. While NSSGA members work diligently to limit miners' exposure to diesel exhaust, there are a number of factors affecting this, including technology employed, availability of ventilation, age and maintenance condition of equipment used, etc. NSSGA is pleased that, in recent years, average diesel particulate matter exposures for MNM miners have been significantly reduced.

Thank you for your consideration.

Sincerely,



Joseph Casper
Vice President, Safety